

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**RESERVATION OF RIGHTS OF ASSURED GUARANTY  
MUNICIPAL CORP. REGARDING EXHIBITS FOR EVIDENTIARY  
HEARING ON CITY'S ASSUMPTION (DOCKET NOS. 17, 157) AND  
POST-PETITION FINANCING (DOCKET NO. 1520) MOTIONS**

Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc. (“Assured”), a creditor and party in interest in the chapter 9 case of the City of Detroit, Michigan (the “City”),<sup>1</sup> hereby files this reservation of rights regarding exhibits that may be used at the Evidentiary Hearing (the “Hearing”) [Docket. No. 1864] related to the City’s (1) Motion for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant to Rule 9019 and (III) Granting Related Relief [Docket. Nos. 17, 157]; and (2) Motion for a Final Order Pursuant to 11

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<sup>1</sup> Assured is a monoline insurer that provides financial guarantees to the U.S. public finance market. Assured and its affiliates insure or reinsure approximately \$2.1 billion in net aggregate principal amount of outstanding bonds issued by the City, including water supply system bonds, sewage disposal system bonds, and unlimited tax general obligation bonds.

U.S.C. §§ 105, 362, 364(c)(1), 364(c)(2), 364(e), 364(f), 503, 507(a)(2), 904, 921, and 922 (I) Approving Post-Petition Financing, (II) Granting Liens and Providing Superpriority Claim Status and (III) Modifying Automatic Stay [Docket. No. 1520]:

1. Assured reserves its right to use any Exhibits listed by the City with respect to the Hearing regarding Docket Nos. 17, 157, and 1520.

2. Assured reserves its right to use any Exhibits marked or identified in depositions of the City's or Objectors' witnesses with respect to Docket Nos. 17, 157, and 1520.

3. Assured reserves its right to use any Exhibits listed by any of the other Objectors with respect to the Hearing regarding Docket Nos. 17, 157, and 1520.

Respectfully submitted,

Dated: December 9, 2013  
New York, New York

**CHADBOURNE & PARKE LLP**

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